

July 21, 2011

VIA ECFS

Ms. Marlene H. Dortch Secretary Federal Communications Commission Room TW-A325 445 12th Street, S.W. Washington, DC 20554 John E. Benedict Assistant Vice President Federal Regulatory Affairs 1099 New York Ave., NW Suite 250 Washington, DC 20001

Tel: (202) 429-3114 Fax: (913) 397-3836

john.e.benedict@centurylink.com

RE: In the Matter of Consumer Information and Disclosure; Consumer and Governmental Affairs Bureau Seeks Comment on "Need for Speed" Information for Consumers of Broadband Services, CG Docket No. 09-158

In the Matter of IP-Enabled Services, WC Docket No. 04-36

In the Matter of Truth-in-Billing and Billing Format, CC Docket No. 98-170

Dear Ms. Dortch:

On Tuesday, July 19, 2011 CenturyLink contacted Walter Johnston, James Miller and Ellen Satterwhite expressing the following:

When the Commission is providing advice to consumers, in an effort to assist those consumers in their broadband decisions, CenturyLink recommends that:

- Any listing of consumer computing activities, showing the download speed and latency for the activities, include direction to consumers that, in determining the connection speed they will need for the type of application they use, the consumer should consider the amount of bandwidth consumed by those applications, as well as the recommended latency for interactive sessions, such as voice, which occur "in real time", versus "non-real time" video on demand sessions. Consumers should note that higher speeds may provide better performance; however, if a consumer's applications perform well inside a specific bandwidth amount, then the consumer may not gain significant additional performance with increased speed.
- Another, very significant, component in the consumer's determination of the amount of speed they need, is the extent to which concurrent use occurs in the consumer's

household. Multiple sessions on different computers in the household will increase the need for speed.

• Finally, should any service tier labeling be used to advise consumers on evaluating their household's broadband service needs, we suggest using the terms "basic", "medium", and "advanced" for the labeling of the levels of service tiers.

The CenturyLink representatives involved in the communication included Mary Retka, Jeb Benedict and Michael Bugenhagen.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in each of the above-referenced dockets.

Sincerely,

John E. Benedict

cc:

Walter Johnston (<u>Walter.Johnston@fcc.gov</u>)
James Miller (<u>James.Miller@fcc.gov</u>)
Ellen Satterwhite (Ellen.Satterwhite@fcc.gov)